

WENDY M. KRINCEK, ESQ., Bar No. 6417
DIANA G. DICKINSON, ESQ., Bar No. 13477
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Email: wkrincek@littler.com
ddickinson@littler.com

Attorneys for Defendant
AMERICAN WAGERING, INC. d/b/a
WILLIAM HILL US

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD SCOTT,

Plaintiff,

vs.

AMERICAN WAGERING, INC. d/b/a
WILLIAM HILL US, a domestic
corporation; AND DOES 1-50, inclusive,

Defendant.

Case No. 2:20-cv-01282-JCM-DJA

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

[FIFTH REQUEST]

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant AMERICAN WAGERING, INC. d/b/a WILLIAM HILL US (“Defendant”) and Plaintiff RICHARD SCOTT (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 23) by extending the outstanding discovery deadlines for a period of thirty (30) days.

This is the fifth request for an extension to the Discovery Plan and Scheduling Order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This request is submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

DISCOVERY COMPLETED TO DATE

Defendant served its initial disclosures on September 15, 2020. Plaintiff served his initial disclosures on or about September 17, 2020. On October 28, 2020, Plaintiff propounded written Requests for Production of Documents and Interrogatories on Defendant. Defendant responded to Plaintiff's discovery on December 30, 2020. Defendant propounded its First Set of Interrogatories and Requests for Production of Documents on Defendant 2, 2020. Plaintiff responded to Defendant's Request for Production of Documents on February 11, 2021, and Defendant's Interrogatories on February 12, 2021. Defendant has issued subpoenas based on Plaintiff's responses to written discovery. Plaintiff supplemented his disclosures on February 11, 2021. Defendant supplemented its disclosures on December 30, 2020, and August 4, 2021. Plaintiff propounded a Second Set of Requests for Production on October 7, 2021. Defendant responded to Plaintiff's Second Set of Requests for Production on November 15, 2021. Since the last request for an extension, Defendant supplemented its disclosures on November 15, 2021. Defendant took Plaintiff's deposition on October 5, 2021. Plaintiff took a deposition of Defendant's Person Most Qualified on November 30, 2021.

DISCOVERY THAT REMAINS TO BE COMPLETED

Plaintiff intends to depose a former employee of Defendant.

REASONS FOR EXTENSION TO COMPLETE DISCOVERY

This extension is necessary to allow both parties ample time to complete all appropriate discovery. Specifically, additional time is needed to take deposition of Defendant's former employee Ali Qutob. Additional time is also needed to allow the parties to re-visit the settlement negotiations engaged in at the ENE held in this matter and the parties believe delaying Mr. Qutob's deposition until negotiations are completed will assist in the potential settlement of this matter.

The parties believe that, absent any unforeseen circumstances, all necessary discovery can be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in order to permit the parties to achieve their respective stated discovery goals and in consideration of current restrictions in place related to the COVID-19 pandemic.

PROPOSED REVISED DISCOVERY PLAN

1. Discovery Cut-Off Deadline

2.

1 The discovery cut-off deadline shall be extended for thirty (30) days from December 27, 2021
2 to **Wednesday, January 26, 2022.**

3 2. Dispositive Motions Deadline

4 The dispositive motion deadline shall be extended to **Friday, February 25, 2022.**

5 3. Joint Pretrial Order Deadline

6 If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial
7 Order shall be extended to **Monday, March 28, 2022 [Deadline lands on Sunday moved to**
8 **Monday]**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall
9 be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or
10 otherwise by further order of the Court.

11 4. Extensions or Modification of the Discovery Plan and Scheduling Order

12 In accordance with Local Rule 26-3, any stipulation or motion for modification or extension
13 of this discovery plan and scheduling order must be made at least twenty-one (21) days prior to the
14 expiration of the subject deadline.

15
16 ///

17
18
19 ///

20
21
22 ///

23
24
25 ///

Accordingly, the parties stipulate, subject to approval of this Court, to the following new proposed deadlines:

	Current Deadline	Revised Deadline
Discovery Cut-Off	Monday, December 27, 2021	Wednesday, January 26, 2022
Dispositive Motions	Wednesday, January 26, 2022	Friday, February 25, 2022
Joint Pretrial Order	Friday, February 25, 2022	Monday, March 28, 2022¹

Dated: December 6, 2021

Dated: December 6, 2021

Respectfully submitted,

Respectfully submitted,

/s/ Theresa M. Santos

/s/ Diana G. Dickinson

DANIEL R. WATKINS, ESQ.
THERESA M. SANTOS, ESQ.
R. SAMUEL EHLERS, ESQ.
WATKINS & LETOFSKY, LLP

WENDY M. KRINCEK, ESQ.
DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

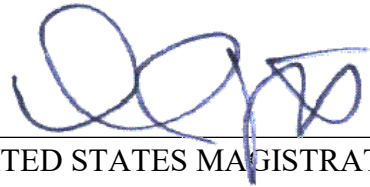
Attorneys for Plaintiff
RICHARD SCOTT

Attorneys for Defendant
AMERICAN WAGERING, INC. d/b/a
WILLIAM HILL US

ORDER

IT IS SO ORDERED.

Dated: December 7, 2021, 2021.



UNITED STATES MAGISTRATE JUDGE

4876-0309-5045.1 / 092768-1004

¹ In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.